

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:

W.R. Grace & Co., *et al.*,

Debtors.

Chapter 11

Case No. 01-01139 (JKF)

(Jointly Administered)

Hearing Date: May 15, 2006 at 2:00 p.m. (ET)

Objection Deadline: April 28, 2006 at 4:00 p.m (ET)

**LIBBY CLAIMANTS' MOTION TO DESIGNATE
A SUBSTITUTE EXPERT TO TESTIFY IN CONNECTION WITH
THE ESTIMATION OF ASBESTOS PERSONAL INJURY LIABILITIES**

Pursuant paragraph 4 of the Court's March 26, 2006 Amended Case Management Order for the Estimation of Asbestos Personal Injury Liabilities (the "Amended CMO"), the claimants injured by exposure to tremolite asbestos from Grace's operations in and near Libby, Montana¹ (the "Libby Claimants"), by and through their counsel, Cohn Whitesell & Goldberg LLP and Landis Rath & Cobb LLP, hereby move to designate a substitute expert that the Libby Claimants may call in the event that Grace raises medical issues specific to the Libby Claimants. By the Libby Claimants' initial designation of experts filed on December 19, 2005 [Docket No. 11373], the Libby Claimants designated Dr. Alan C. Whitehouse and Dr. David Egilman as their experts in the estimation proceedings. Because Dr. Egilman recently notified the Libby Claimants that he will be unavailable to act as an expert in the case, the Libby Claimants wish to substitute Dr. Bruce W. Case for Dr. Egilman. Dr. Case's contact information is as follows:

¹ As identified in the Amended and Restated Verified Statement of Cohn Whitesell & Goldberg LLP and Landis Rath & Cobb LLP Pursuant to Fed. R. Bankr. P. 2019 [Docket No. 11624], as it may be amended and restated from time to time.

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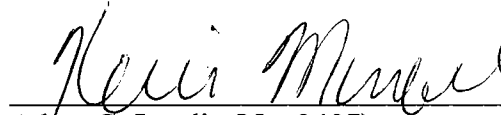
The Libby Claimants respectfully submit that no party will be adversely affected by the substitution of Dr. Egilman by Dr. Case at this early stage of the estimation proceeding. Concerning expert witnesses, the next step under the Amended CMO is for expert reports to be submitted on June 20, 2006. Assuming that this motion is granted at or before the omnibus hearing of May 15, 2006, the Libby Claimants anticipate that Dr. Case's expert report will be produced by June 20, 2006.

The Libby Claimants have conferred with Grace's counsel concerning this substitution.

The Libby Claimants reserve their rights to substitute and/or add experts as further discovery and investigation may warrant, and as the Amended CMO provides.

Dated: April 10, 2006

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